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February 8, 2012

By Fax

Hon. Alvin K. Hellerstein
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1050
New York, NY 10007Re: Deep Woods Holdings, LLC v. Savings Deposit Insurance Fund of the Republic of Turkey, No. 07-CV-934

Dear Judge Hellerstein:

We represent non-parties Turkiye Vakiflar Bankasi T.A.O. ("Vakif") and T. C. Ziraat Bankasi A.S. ("Ziraat") in the above-referenced matter.

We write to request that the Court vacate its order dated February 3, 2012 (the "Order") that granted Deep Woods' motion to compel (the "Motion"). Before Deep Woods made the Motion, the parties agreed to a briefing schedule pursuant to which the Banks would serve their opposition on or before February 16. A copy of the agreement is enclosed for the Court's ready reference. Unfortunately the parties did not communicate their agreement to the Court, for which we apologize.

In light of the parties' prior agreement, we respectfully ask that the Court vacate the Order and permit the parties to brief the Motion as agreed, i.e., the Banks' opposition to be served on Thursday, February 16, and Deep Woods' reply to be served on Friday, March 2. Counsel for Deep Woods has confirmed the agreement.

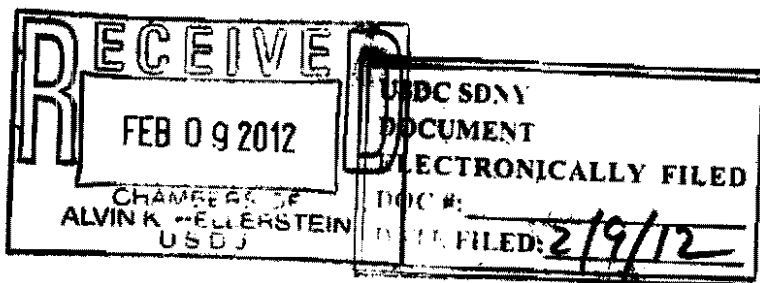
Respectfully submitted,

Michael T. Sullivan / *msc*
Michael T. SullivanDirect line: 212 660 3024
msullivan@sandw.com

enc.

cc: James S. O'Brien (by email, w enc.)

BOSTON NEW YORK WASHINGTON, DC



Revised. My order stands. Payment may move by an appropriate motion to set aside or reconsider the order. 2-9-12

Capehart, Julie D.

From: Sullivan, Michael
Sent: Wednesday, February 08, 2012 12:10 PM
To: Capehart, Julie D.
Cc: Solomon, Andrew T.
Subject: FW: 1:07-cv-00934-AKH Deep Woods Holdings, L.L.C v. Savings Deposit Insurance Fund of The Republic of Turkey
confirming the 30 days until Feb 16

From: Sullivan, Michael
Sent: Thursday, January 19, 2012 4:15 PM
To: 'Bagley, Ross'
Subject: RE: 1:07-cv-00934-AKH Deep Woods Holdings, L.L.C v. Savings Deposit Insurance Fund of The Republic of Turkey

probably makes sense.

Michael T. Sullivan
Attorney at Law

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BOSTON NEW YORK WASHINGTON, DC

From: Bagley, Ross [mailto:RBagley@PRYORCASHMAN.com]
Sent: Thursday, January 19, 2012 4:14 PM
To: Sullivan, Michael
Subject: RE: 1:07-cv-00934-AKH Deep Woods Holdings, L.L.C v. Savings Deposit Insurance Fund of The Republic of Turkey

Confirmed. The opposition would otherwise be due next week. Should we file a stipulation laying out the briefing schedule?

From: Sullivan, Michael [mailto:msullivan@sandw.com]
Sent: Tuesday, January 17, 2012 6:22 PM
To: Bagley, Ross
Cc: Raice, Pinchus D.; O'Brien, Jr. James S.; Akley, Benjamin; john.basinger@bakermckenzie.com; mmchugh@baileylawpc.com; kbailey@baileylawpc.com; michael.atkins@bakermckenzie.com
Subject: RE: 1:07-cv-00934-AKH Deep Woods Holdings, L.L.C v. Savings Deposit Insurance Fund of The Republic of Turkey

2/8/2012

Ross:

E-versions safely rec'd.

Per our agreement:

Our opposition shall be due on or before Feb 16; and your reply on or before Mar 2.

Also, pls add Andrew Solomon to the distribution list: Asolomon@sandw.com 212 660 3023

Regards,

Michael T. Sullivan
Attorney at Law

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New York, NY 10104

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msullivan@sandw.com
www.sandw.com

BOSTON NEW YORK WASHINGTON, DC

From: Bagley, Ross [<mailto:RBagley@PRYORCASHMAN.com>]
Sent: Friday, January 13, 2012 5:19 PM
To: Sullivan, Michael; 'john.basinger@bakermckenzie.com'; 'mchugh@baileylawpc.com';
'kbailey@baileylawpc.com'; 'michael.atkins@bakermckenzie.com'
Cc: Raice, Pinchus D.; O'Brien, Jr. James S.; Akley, Benjamin
Subject: 1:07-cv-00934-AKH Deep Woods Holdings, L.L.C v. Savings Deposit Insurance Fund of The Republic of Turkey

Counsel,

Please see attached.

Regards,
Ross M. Bagley

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2/8/2012

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2/8/2012